

LAW OFFICE OF
SCOTT D. GIBSON, PLLC
1632 N. COUNTRY CLUB RD.
TUCSON, ARIZONA 85716
(520) 784-2600
SBN: 007395
ecf@sdglaw.net
scott@sdglaw.net

Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re

Debtor.

NATIONSTAR MORTGAGE, LLC, its
assignees and/or successors,

Movant.

v.

BERTIE SUSAN BRODSKY aka Berti S. Brodsky fdba Berti S. Brodsky Insurance Agency, fdba The Spice of Life Gourmet, Debtor; Dianne C. Kerns, Chapter 13 Trustee

Respondents.

In Proceedings Under Chapter 13

NO. 4:16-bk-00885-BMW

RESPONSE TO NATIONSTAR MORTGAGE, LLC'S MOTION FOR RELIEF FROM AUTOMATIC STAY AND ABANDONMENT OF ESTATE PROPERTY

(7016 A & B Gaston Lane SW
Tumwater, WA 98501)

The Debtor, Bertie Brodsky, in response to the Motion for Relief from Automatic Stay filed by Nationstar Mortgage, LLC, respectfully asserts that Nationstar Mortgage, LLC, has contacted the Debtor directly and has made arrangements for modifications to the mortgages, and the Debtor has commenced making payments under those proposed modifications. Should the

1 Debtor make three consecutive payments under the proposed modifications, the modifications will
2 take affect and will go forward, which will be incorporated into the Debtor's Chapter 13 Plan.

3 Accordingly, for the foregoing reasons, the Debtor respectfully requests that the
4 Motion for Relief from Automatic Stay be denied.

5 RESPECTFULLY SUBMITTED this 18th day of January, 2017.

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
LAW OFFICE OF SCOTT D. GIBSON, PLLC

By: /s/ Scott D. Gibson (007395)

Scott D. Gibson
Attorneys for Debtor

CERTIFICATE OF SERVICE

Original electronically filed and copies of the foregoing served via the Court's CM/ECF
Notification System this 18th day of January, 2017, on all Electronic Case Filing Participants that
have appeared in the above-captioned case, or U.S. Mail to parties not registered through
CM/ECF.

Kristin McDonald
Lakshmi Jagannath
MCCARTHY & HOLTHUS
8502 E. Via De Ventura, Suite 200
Scottsdale, AZ 85258
Attorneys for Nationstar, LLC

Dianne C. Kerns
7320 N. La Cholla #154 PMB 413
Tucson, AZ 85741
Chapter 13 Trustee

By: /s/ Maria Calderon